

JUL 02 2003 14:30 FR BANK OF AMERICA OP 954 928 1454 TO 914105760544 P.02/02

**Bank of America.**



Bank of America  
Subpoena Unit  
FL6-001-02-12  
PO Box 407090  
Fort Lauderdale, FL 33340-7090

**VIA FACSIMILE**  
**AND FEDERAL EXPRESS**

July 2, 2003

Howard J. Schulman, Esquire  
Schulman & Kaufman, LLC  
One Charles Center  
100 N. Charles Street, Suite 600  
Baltimore, Maryland 21201

Re: Wyndholme Village, LLC, et al. v. NADIF of Wyndholme, LLC, et al.  
Case No. L01-3809  
Subpoena

Dear Mr. Schulman:

Pursuant to Fed. R.Civ. P. 45(c)(2)(B), Bank of America, N.A. is hereby submitting to you its written objection to the subpoena directed to and served on Bank of America relating to the above-referenced case.

Bank of America is in receipt of a Motion to Quash filed on behalf of NADIF of Wyndholme, LLC, WVI, LLC, John R. "Jack" Quinn and Howard "Rusty" Zukerman. Pursuant to Rule 45(c)(2)(B) and Fla. Statute §655.059(e), please be advised that Bank of America will not produce the documents responsive to the subpoena unless and until a court order is issued requiring production of the documents. In addition Bank of America will require reimbursement for its costs of producing the documents.

Very truly yours,

A handwritten signature in black ink, appearing to read "Yolanda Guevara".

cc: William C. Sammons, Esquire



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